

CLOSURE PLAN FOR PVS CHEMICALS, INC. (ILLINOIS)

- I. PURPOSE: This plan is submitted for the closure, within the meaning of Section 725.210 et seq., of the Rules and Regulations of the State of Illinois, of a holding pond maintained by PVS Chemicals, Inc. (Illinois).
- II. OWNER/
OPERATOR: PVS Chemicals, Inc., (Illinois)
12260 South Carondelet Avenue
Chicago, Illinois 60633
(312) 933-8800
(hereinafter, the "Company")
EPA Facility I.D. #0316550004
- III. LOCATION: The holding pond maintained by the Company is located near the southern boundary of the Company's property at the above address as shown more particularly on the Works map, attached hereto as Exhibit A. The holding pond is approximately 150' north of the southern boundary line and approximately 70' west of the shop building.
- The overall dimensions of the holding pond are 160'x121' outside and 98'x80' inside by 6' high.
- IV. HISTORY: The holding pond was constructed by the facility's previous owner, the Allied Chemical Corporation (hereinafter, "Allied") in 1977. Independent investigation by the Company has revealed the following details regarding construction:
- The holding pond was designed for a life of twenty (20) years.
 - The holding pond has a total capacity of 450,000 gallons.
 - The holding pond was constructed of compacted earth and clay. These materials were covered with a burlap and asphalt liner on the inside of the holding pond and on the outside slopes. The liner materials were applied in layers to achieve a final thickness of 5/8".

Independent investigation by the Company confirms that Allied submitted a Part A hazardous waste permit application under the Resource Conservation and Recovery Act (hereinafter, "RCRA") on or about November 14, 1980, concerning this facility. This application included the holding pond. On October 13, 1981, the Company purchased the facility from Allied and advised the U.S. Environmental Protection Agency (hereinafter, "USEPA") of this change. The Illinois Environmental Protection Agency (hereinafter, "IEPA") acknowledged notice of the change by letter dated February 18, 1982, a copy of which is attached hereto as Exhibit B.

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EPA Region 5 Records Ctr.



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*acknowledged
change as generator,
not as
TSD.*

CLOSURE PLAN FOR PVS CHEMICALS, INC. (ILLINOIS) Cont'd....

IV. Cont'd...

The facility had been used by Allied and continues to be used by the Company primarily for the manufacture of sulfuric acid. Thus, the holding pond was used and continues to be used to contain and neutralize water acidulated with sulfuric acid from small leaks within diked process areas, washings which resulted from cleaning vessels to effect entry and repair, floor washings, and rainwater. The Company neutralizes the waste as follows:

- a. An in-line pH control system pretreats the acidic water to assure that waste initially entering the holding pond is above a 2.0 pH. Thus, the acid water does not constitute a hazardous waste and no hazardous waste is stored in the holding pond.
- b. Subsequently, the water in the holding pond is re-circulated and the pH is increased to about 7.0 to precipitate iron. After the ferric hydroxide settles, clear water is decanted to The Metropolitan Sanitary District of Greater Chicago.
- c. The iron sludge that accumulates in the impoundment is disposed of by Permit and is classified: Non-hazardous - Not Subject to Fee.

Prior to the Company's purchase of the facility, Allied analyzed the precipitated sludges. The results of this analysis, which indicated no hazardous waste within the meaning of RCRA, are attached hereto as Exhibit C. During the Company's operation of the facility, the pond sludges have also been analyzed, with similar results, upon removal for disposal. A copy of the results of the analysis is attached as Exhibit D. The Company is certain that its operation of the holding pond since November, 1981, has resulted in the storage of only non-hazardous waste within the meaning of RCRA and applicable rules and regulations of USEPA and IEPA. The impoundment was emptied completely in 1982 for inspection and repair.

Finally, notwithstanding the Company's operation of the holding pond to manage only non-hazardous waste, if such waste had been hazardous, the application of Sections 725.190 to 725.194 of the Rules and Regulations to the State of Illinois would not have been automatic. The holding pond meets the test of Section 725.190(e) which provides for a waiver of requirements.

The Company will perform a sampling and analysis program, described below in more detail, to confirm the non-hazardous contents and operation of the holding pond. The program shall be carried out as follows:

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this is correct

did results of this inspection show any signs of cracks

irrelevant, have not

725.190(e)(2)

V. CLOSURE:

CLOSURE PLAN FOR PVS CHEMICALS, INC. (ILLINOIS) Cont'd.....

- a. The Company will retain Environmental Monitoring and Technologies, Inc., to perform the sampling and analysis in accordance with the terms of the proposal attached hereto as Exhibit E.
- b. In accordance with Section 725.213 of the Rules and Regulations of the State of Illinois, the sampling and analysis program will be commenced within ninety (90) days of approval of this plan and completed within one hundred eighty (180) days of approval of this plan. It is expected that closure, pending IEPA approval, will be completed in 1985.
- c. Based upon constant monitoring of holding pond operations and the previous analytical experience described in Exhibits C and D, it is anticipated that disposal or decontamination of facility equipment as required by Section 725.14 of the Rules and Regulations of the State of Illinois will not be necessary. The structure of the facility (holding pond), with the meaning of said Section 725.14, will remain in place.
- d. When closure is completed the Company will submit to the Director of IEPA certification by itself and an independent registered professional engineer that the facility has been closed in accordance within the specifications of the approved closure plan pursuant to Section 725.215 of the Rules and Regulations of the State of Illinois.
- e. During and after completion and certification of closure the Company will operate the holding pond in the same manner as described above in Section IV. It is intended that the holding pond will remain operational as a temporary storage site for non-hazardous acid water wastes generated at the facility as described above.
- f. In the extremely unlikely event that the sampling and analysis program, described in paragraph (a) of this Section, results in a determination that hazardous wastes are stored in the holding pond, the Company shall submit an amended closure plan pursuant to the procedure described in Section 725.212(b) of the Rules and Regulations of the State of Illinois.

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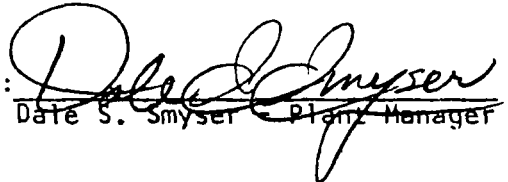
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CLOSURE PLAN FOR PVS CHEMICALS, INC. (ILLINOIS) Cont'd....

VI. POST-CLOSURE: Based upon the non-hazardous nature of the waste stored by the Company in the pond and the waiver provided in Section 725.190(e) of the Rules and Regulations of the State of Illinois, the Company requests a determination that the post-closure requirements of Section 725.218 et seq., of said Rules and Regulations are inapplicable. While the holding pond continues to be used for storage of non-hazardous waste, necessary sampling and analysis to maintain the current Permit status of "Non-Hazardous - Not Subject to Fee" will be performed. In the event the Company terminates operation at the facility, the holding pond would be drained and graded as a non-hazardous storage facility.

PVS CHEMICALS, INC. (ILLINOIS)

BY: 
Dale S. Smyser - Plant Manager

Submitted February 14, 1985

Encl. Exhibits A, B, C, D, & E

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